



# West Lake Update

December 10, 2015

## EPA Orders West Lake Landfill Parties to Implement Surface Fire Prevention Measures

EPA Region 7 has issued a Unilateral Administrative Order (UAO) to Bridgeton Landfill, LLC; Rock Road Industries, Inc.; and Cotter Corporation to develop and implement surface fire prevention measures at the West Lake Landfill Site. The order follows a surface fire incident at the landfill that did not contact any radiologically impacted material (RIM).

The parties must submit a surface fire prevention workplan to the agency that includes:

- Plans for the placement of a non-combustible material over all exposed areas at Operable Unit-1 (OU-1) where RIM is currently known to be at or near the surface;
- Plans for clearing trees and vegetation where RIM is currently known to be located at or near the surface in OU-1, and the placement of non-combustible material over the cleared areas;
- Plans for testing to confirm that RIM located at or near the surface has been covered;
- Plans for air monitoring to ensure protection of on-site workers and the surrounding community during clearing of trees and vegetation as well as during placement of non-combustible material;
- Plans for maintenance of the non-combustible material until EPA selects and implements a final remedy at the site that

addresses RIM at the surface;

- A current West Lake Landfill map clearly indicating where RIM is located at or near the surface in OU-1, which of those areas are currently covered by vegetation or other materials and which remain exposed to the atmosphere; and

- A plan to ensure remaining trees and vegetation in OU-1 do not pose a fire risk that could result in potential release of RIM into the atmosphere.

In addition to requiring a surface fire prevention workplan, the order requires the parties to submit a framework for an Incident Management Plan (IMP) at OU-1. Among other requirements, the IMP will:

- Describe a system for 24-hour site observation;



- Describe measures to prevent incidents which could result in the release of hazardous substances and anticipated initial response actions;
- Define responses for various emergency scenarios at OU-1, to include surface fires;
- Identify when and how personnel will notify local emergency responders and regulatory authorities, to include EPA, the Missouri Department of Natural Resources, and the Missouri Department of Health and Senior Services, in the event of any emergency scenario identified by the IMP;
- Describe planned response actions to advise local emergency officials on emergency actions to protect on-site workers and the community.

The order is one of EPA's enforcement authorities. It allows EPA to require the parties to conduct the work. This order is being issued to Bridgeton Landfill, Rock Road, and Cotter Corporation as these parties have traditionally performed the work at OU-1.

EPA has signed an Enforcement Action Memorandum to accompany the order. The Action Memorandum describes the potential risks from a surface fire impacting radiologically impacted material located on the surface in OU-1, and documents the required actions. EPA will make the Administrative Record for this action available within 60 days.

As a part of its continued coordination with its partners at the site, EPA will engage with local first responders, including Pattonville Fire District, to inform responders of the workplan and Incident Management Plan submitted by the parties.

The order is available on EPA Region 7's

West Lake Landfill web site:

[www.epa.gov/region7/cleanup/west\\_lake\\_landfill/](http://www.epa.gov/region7/cleanup/west_lake_landfill/)

## October 24 Surface Fire Report

Following the October 24 surface fire on



Republic Services property, EPA dispatched On-Scene Coordinators to conduct sampling of the burned area to determine the presence of any radionuclides. Soil samples taken at the site were generally consistent with naturally occurring background radiation. That report is available on EPA Region 7's West Lake Landfill website:

[www.epa.gov/region7/cleanup/west\\_lake\\_landfill/](http://www.epa.gov/region7/cleanup/west_lake_landfill/)

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